

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:14-CV-00159-KS-MTP

DANIEL G. “DANNY” ABEL, et al

DEFENDANTS

**RESPONSE TO PLAINTIFF’S MOTION FOR EXTENSION
OF TIME BY DEFENDANTS, RAMONA FERNANDEZ,
JANEY LAMAR, and STUART SMITH LAW CLINIC**

COME NOW, three of the Defendants, Ramona Fernandez, Janey Lamar, and the Stuart H. Smith Law Clinic and Center for Social Justice of Loyola University New Orleans, incorrectly named by Plaintiff as the “Stuart Smith Law Clinic d/b/a Loyola University New Orleans” (hereinafter collectively referred to as “these Defendants”), by and through counsel, and file this their Response to Plaintiff’s Motion for Extension of Time [Doc. #38 and 39] to file a response to these Defendants’ Motion to Dismiss and would show unto the Court the following:

I.

The stated bases for Plaintiff’s Motion for Extension of Time are not germane to the Motion to Dismiss filed by these Defendants. The matters stated in Plaintiff’s Motion and Memorandum seeking a twenty-one (21) day extension of time to respond to these Defendants’ Motion to Dismiss are not related to either these Defendants, Plaintiff’s claims against these

Defendants, or to the grounds for the Motion to Dismiss filed by these Defendants. Accordingly, these Defendants would object to and oppose Plaintiff's Motion.

II.

In addition, two of the exhibits Plaintiff attached in support of his Motion [Doc. # 39-1 and 39-2] actually support the grounds for dismissal asserted by these Defendants. The other two exhibits are not relevant to these Defendants, Plaintiff's claims against these Defendants, or to the grounds for the Motion to Dismiss filed by these Defendants. However, none of Plaintiff's exhibits support his Motion for Extension of Time to file a response to the Motion to Dismiss. Nor do they demonstrate any actionable conduct on the part of these Defendants in the Louisiana cases in which they have participated on behalf of a minor child.

WHEREFORE, PREMISES CONSIDERED, these Defendants respectfully request that this Honorable Court enter an order denying Plaintiff's Motion for Extension of Time [Doc. #38] or for such other relief deemed appropriate by the Court under the circumstances.

Respectfully submitted this the 4th day of June, 2015.

Ramona Fernandez, Janey Lamar, and the Stuart H. Smith
Law Clinic and Center for Social Justice of Loyola
University New Orleans, Defendants

BY: DUKES, DUKES, KEATING & FANCA, P.A.

BY: /s/ W. Edward Hatten, Jr.

W. EDWARD HATTEN, JR. (MSB #8859)
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CERTIFICATE OF SERVICE

I, W. Edward Hatten, Jr., do hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

Douglas Handshoe, Pro Se Plaintiff
Post Office Box 788
110 Hall St.
Wiggins, MS 39577

and also mailed the same via U.S. Mail to the following:

Daniel G. Abel, Pro Se Defendant
2421 Clearview Parkway
Metairie, LA 70001

Chris Yount, Pro Se Defendant
545 Terrace Street
Jefferson, LA 70121

This the 4th day of June, 2015.

BY: /s/ W. Edward Hatten, Jr.

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